

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	Bankruptcy No. 21-21712-CMB
)	
Eustace O. Uku,)	Chapter: 13
)	
Debtor,)	
Eustace O. Uku,)	
)	
Movant,)	
v.)	
)	
Allegheny County, City of Clairton,)	
Carrington Mortgage Services, Fox Chapel)	
ASD and Borough, PA Department of)	
Revenue, Penn Hills SD and Municipality,)	
Charles A. Knoll, Jr., Bank of America,)	
Capital One Bank, LVNV Funding,)	
Citizens Bank, PNC Bank, UPMC,)	
Guardian Protection Services and Verizon,)	
)	
Respondents.)	

OBJECTION TO DEBTOR'S MOTION TO EXTEND
THE COMPLETION DATE

Introduction and Case History:

1. On the evening of July 29, 2021, the Debtor, Eustace O. Uku ("Uku") filed a Voluntary Petition under Chapter 13. On the same date, Uku filed an Expedited Motion to Extend Automatic Stay.

2. Creditor, Charles A. Knoll, Jr. ("Knoll"), filed a response to the Motion and requested a Rule to Show Cause pursuant to this Court's dismissal of Debtor's previously dismissed Chapter 13 Bankruptcy. This Court issued a Rule to Show Cause as to why Debtor's bankruptcy should not be dismissed with prejudice.

3. On August 12, 2021, argument was held on the Expedited Motion for Stay.

4. As this Court is aware and noted, Uku's previous bankruptcy was wrought with fraud, including but not limited to failure to list property belonging to the estate, improper filings and filings filled with misinformation, among other items. At the hearing on August 12, 2021, the Court specifically noted that any issues would be scrutinized.

5. Neither Counsel for Uku nor Uku mentioned that more time would be necessary to file the required documents that were due on August 12, 2021.

6. In fact, Uku's counsel contacted Knoll's counsel and they discussed an appraisal directly after argument. No mention or request was made regarding the necessary filings.

7. Then, on or around 3:30 p.m. on August 12, 2021, Uku filed a Motion to Extend the Completion Date stating the case was complex. This cannot be permitted. Uku has known of the bankruptcy filing since at least June 24, 2021 when he obtained credit counseling.

8. This is not a complex case. Uku has a few properties, few assets and a few debts. The schedules should be a simple matter as Uku has already represented his financial status and a plan.

9. The only thing that would make this case complex is Uku. If Uku cannot timely file the required documents, his case should be dismissed with prejudice.

WHEREFORE, it is prayed this Honorable Court Deny Uku's Motion to Extend the Completion Date and dismiss this case with Prejudice if said documents are not timely filed.

Respectfully Submitted,

MAURICE A. NERNBERG & ASSOCIATES

By: /s/ David M. Nernberg
David M. Nernberg
Pa. I.D. No. 205631
Maurice A. Nernberg & Associates
301 Smithfield Street
Pittsburgh, PA 15222
(412) 232-0334
dmn@nernberg.com

Counsel for Charles A. Knoll, Jr.